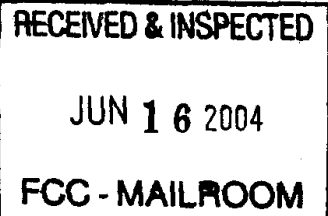


88.5^{fm}

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WFCR.org

Public Radio for Western New England



DATE June 14, 2004

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: MM DOCKET No. 99-325

Dear Ms. Dortch,

On behalf of WFCR/88.5 FM, Amherst, Massachusetts; the University of Massachusetts, licensee of public radio station WFCR; the WFCR Advisory Committee; and Friends of WFCR, Inc., we respectfully urge the Commission to approve the use of digital multicasting for the purpose of providing a Supplemental Audio Channel ("SAC") on FM channels.

This proposal has the potential to double the service public radio stations provide their communities by addressing one of the biggest blocks to public service these stations face.

That problem is the lack of available channels. It might not be readily apparent that this is so, since 20 channels are reserved for non-commercial use on the FM band. However, as use of those channels has developed in most communities, very few are available to what are often called "public radio stations."

These stations are known for their in-depth news programs, the broadcast of music rarely heard on commercial radio, and a commitment to local programming. In cities where more than

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one public radio station exists, each can concentrate on meeting one of those programming needs. But more often, unfortunately, only one public radio service exists in an area, and community access to programming suffers because the station must either divide its airtime among several program services, limiting the availability of each, or favor one community need and ignore others entirely. Either way, listeners are deprived of many hours of excellent and important programming they could otherwise hear.

There is, in theory, an easy solution to this limitation on service: the expansion of public radio onto additional channels. However, due to the crowding of the FM band in most communities, there is virtually no possibility for public stations to acquire new frequencies. Additionally, due to the concentration of station ownership that has developed in recent years and the extreme increase in station prices, only rarely can public broadcasters afford to buy existing stations, if any even come onto the market.

The quality and quantity of public radio programs is growing, and stations are continually improving their ability to provide a valued public service, but they are prevented from doing so because of being limited to just the one channel.

Our radio station, WFCR, is a good example of these problems. It is the only public radio station licensed to Western Massachusetts, and listeners appreciate its national and local news programming; its broadcasts of classical, jazz and folk music; and its program for the local Spanish-speaking community. But there is far more programming in each of these areas – good, thoughtful, enriching programming – that the station could offer if an additional channel were available.

If the SAC proposal is approved by the Commission, and if it succeeds in becoming the true second service many hope it will be, the ability of public radio stations like WFCR to serve

their communities will be doubled, and the wealth of news and music programming that listeners can hear will double.

This summer WFCR will begin transmitting both an analog and digital signal, becoming the first radio station in Western New England to broadcast in HD Radio. Other public radio stations throughout the country are following suit. It is therefore our hope that the Commission will rule favorably and quickly to allow WFCR and other public broadcasters to transmit a second programming service using the Supplemental Audio Channel.

Thank you for your consideration of this important and historic opportunity.

Sincerely yours,



Martin Miller
General Manager, WFCR



John Mullin
Vice Provost for Outreach,
UMass Amherst



Jenny Kallick
Chair, WFCR Advisory Committee



Sandy Pearson
President, Friends of WFCR, Inc.